

### **REMARKS**

This amendment is responsive to the Non-Final Office Action mailed on July 22, 2009. Claims 1-7 and 28-47 are pending in the application and stand rejected. Claims 1, 32, 37 and 42 have been amended. In view of the following remarks, Applicant respectfully submits that this application is in complete condition for allowance and requests reconsideration of the application in this regard.

### **Rejections under 35 USC §103**

The Examiner has rejected claims 1-7 and 28-47 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,944,620 to Cleraux et al. (*Cleraux*). Of these claims, claims 1, 32, 37 and 42 are the independent claims.

In the previous amendment after final Office Action, Applicant asserted that *Cleraux* failed to disclose or suggest converting a filesystem from one filesystem type to a second filesystem type while maintaining the filesystem in a full operational capacity. Applicant maintains this position. To better understand the filesystem conversion, Applicant has amended the independent claims 1, 32, 37, and 42, to clarify that converting the first filesystem type to the second filesystem type “includ[es] activating the second directory and deleting the first directory.” Support for this amendment can be found in FIGS. 9A-9F and paragraphs [0061]-[0069] of the published application.

While Applicant continues to maintain that *Cleraux* does not disclose converting a file from one filesystem type to another, *Cleraux* additionally fails to disclose or even suggest activating a directory in one filesystem type and deleting a corresponding directory of another filesystem type as part of the conversion process as now recited in the amended independent claims. Furthermore, one of ordinary skill in the art, after a careful reading of *Cleraux*, would not be motivated to delete any of the information from the filesystem associated with the target computer so that the host computer operating with a different filesystem type could access a file or directory associated with the target computer. In fact, given that *Cleraux* is directed to emulating one filesystem in a computer that runs another filesystem, deleting one directory in one filesystem while activating another would likely be highly undesirable, and thus potentially render *Cleraux* unsuitable for its intended purpose. Therefore, Applicant submits that amended independent claims 1, 32, 37 and 42 are non-obvious over *Cleraux*. Consequently, Applicant

respectfully requests that the rejections of claims 1, 32, 37, and 42, and claims 2-7, 28-31, 33-36, 38-41, and 43-47 which depend therefrom, be withdrawn.

As a final matter, Applicant further notes that the remaining dependent claims recite additional features that further distinguish these claims from the reference cited by the Examiner. However, in the interest of prosecutorial economy, these remaining claims will not be addressed separately herein.

### Conclusion

Applicant has made a bona fide effort to respond to each and every requirement set forth in the Office Action. In view of the foregoing amendments to the claims and remarks given herein, Applicant respectfully believes this case is in condition for allowance and respectfully requests allowance of the pending claims. If the Examiner believes any detailed language of the claims requires further discussion, the Examiner is respectfully asked to telephone the undersigned attorney so that the matter may be promptly resolved. The Examiner's prompt attention to this matter is appreciated.

Applicant is of the opinion that no additional fee is due as a result of this Amendment. Payment of all charges due for this filing is made on the attached Electronic Fee Sheet. If any additional charges or credits are necessary to complete this communication, please apply them to Deposit Account No. 23-3000.

Respectfully submitted,

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Date

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